

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

FILED
U.S. DISTRICT COURT
SAVANNAH DIV.
DEC 27 AM 8:43

UNITED STATES OF AMERICA

v.

DANIEL JOHN WISE

INFORMATION NO. *Mah*

VIO: 18 U.S.C. § 371

Conspiracy

CR 413 - 220

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE
CONSPIRACY
18 U.S.C. §371

1. That from on or about January 1, 2011, up to and including on or about May 30, 2011, in Chatham County, in the Southern District of Georgia, and elsewhere, the defendant, **DANIEL JOHN WISE**, aided and abetted by others, did knowingly and willfully combine, conspire, confederate and agree with other persons:

a) to knowingly and intentionally distribute and dispense, and cause to be distributed and dispensed, quantities of controlled substances, including oxycodone, a Schedule II controlled substance, hydrocodone, a Schedule III controlled substance, and alprazolam, a Schedule IV controlled substance, not for a legitimate medical purpose and not in the usual course of professional practice, contrary to Title 21, United States Code, Section 841(a)(1); and

b) to knowingly and willfully engage in financial transactions concerning East Health Center, Garden City, Georgia, which transactions involved the proceeds of specified unlawful activity, that is, the unlawful dispensation of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), with the intent to promote the carrying on of the specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1).

OVERT ACTS

2. In furtherance of the conspiracy and to affect the objects of the conspiracy, the following overt acts, among others, were committed in the Southern District of Georgia and elsewhere:

- a) In early 2011, members of the conspiracy found a location to operate East Health Center.
- b) In early 2011, members of the conspiracy hired employees and trained them on how to operate the pill mill.
- c) Between February 2011 and May 2011, members of the conspiracy employed medical doctors to work at East Health Center.
- d) Members of the conspiracy paid the medical doctors cash for their prescription writing services.
- e) Members of the conspiracy unlawfully dispensed Schedule II, III and IV controlled substances to customers for money paid by cash or credit card.
- f) Members of the conspiracy engaged in marketing techniques to attract as many customers as possible to East Health Center.
- g) Between January 18, 2011 and February 25, 2011, conspirators made multiple deposits, by check and cash, to SunTrust Bank Account No. 1000133995083 ranging in amount from \$6,000 to \$29,000.
- h) Between March 22, 2011 and May 25, 2011, conspirators made multiple cash deposits to BB&T Bank Account No. 0005242045442 ranging in amount from \$20.00 to \$9,622.00.
- i) Between February 19, 2011 and May 12, 2011, defendants made weekly salary payments by cash or check to Daniel John Wise in amounts ranging between \$700 and \$1,000.
- j) Between March 1, 2011 and May 1, 2011, conspirators made periodic payments by cash and check to lease the premises located at 626 U.S. Highway 80, Garden City, Chatham County

Georgia in which East Health Center was operated, and to rent a house located at 50 Crystal Lake Drive, Pooler, Chatham County, Georgia, where various conspirators, including Daniel John Wise, resided from time to time during the course of the conspiracy.

k) Between January 21, 2011, and May 25, 2011, conspirators engaged in numerous credit card transactions to promote the unlawful conspiracy.

All done in violation of Title 18, United States Code, Sections 2 and 371.

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